Paul Hastings

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December 5, 2008

29247.00009

VIA HAND DELIVERY AND E-FILE

Lester A. Heltzer
Executive Secretary
National Labor Relations Board
1099 14th St. N.W.
Washington, D.C. 20570

Re:

CNN America, Inc. and Team Video Services,

Case Nos. 5-CA-31828 & 5-CA-33125 (formerly 2-CA-36129)

Dear Mr. Heltzer:

As counsel for CNN America in the above-referenced cases, I have received the General Counsel's Opposition to our Motion for an Extension of Time to File Exceptions and Extension of the Page Limit. I feel compelled, in light of the General Counsel's position that our requests are "unnecessary and excessive", to ask your office to recall that CNN, should Judge Amchan's decision be adopted by the Board, would be required to pay millions of dollars in back pay and disrupt many aspects of its business operations. CNN believes that it is entitled to be heard fully in this matter, of enormous significance to CNN, and that due process demands that the National Labor Relations Board be fully informed of CNN's views and consider them fully before making a decision. That was and remains the reason for our requests, which we believe are absolutely necessary to a full and fair consideration of the issues in this matter. The General Counsel's position is, in our view, both without substance and an attempt to impose inappropriate limits on CNN's right to be heard. We hope that your office will allow CNN to express its views in this case completely by granting our Motions. I can assure you that should CNN be able to state its views fully in less than 300 pages, we will not hesitate to do so. It surely is not our desire to burden the record, but to ensure that CNN's arguments are presented fully and fairly to the Board.

Thank you for your consideration of the views expressed herein, and in our Motions.

Paul Hastings

Lester A. Heltzer December 5, 2008 Page 2

Very truly yours,

Zachary D. Fasman

of PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: See Attached Affidavit of Service

LEGAL_US_E # 81871597.1

UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC, JOINT EMPLOYERS

and

Case 5-CA-31828

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES & TECHNICIANS, COMMUNICATIONS WORKERS OF AMERICA, LOCAL 31, AFL-CIO

and

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC, JOINT EMPLOYERS

and

Case 5-CA-33125 (formerly 2-CA-36129)

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES & TECHNICIANS, COMMUNICATIONS WORKERS OF AMERICA, LOCAL 11, AFL-CIO

AFFIDAVIT OF SERVICE

Karen C. Davis being duly sworn, deposes and says as follows:

- 1. I am over 18 years of age, am not a party to this proceeding, and am employed by the law firm of Paul, Hastings, Janofsky & Walker LLP, 875 15th Street, N.W., Washington, D.C. 20005.
- 2. On the 5th day of December, 2008, I filed, by hand delivery, an original and eight copies, and also sent one courtesy copy by facsimile, of a Letter In Reply to General Counsel's Opposition to CNN's Request for Extension of Time To File Exceptions And For An Extension Of The Page Limit In Support of Exceptions, as well as an E-File, with Lester Heltzer, Executive Secretary, National Labor Relations Board, 1099 14th Street, N.W., Washington, D.C. 20570.

3. On the 5th day of December, 2008, I served one true and correct copy of a Letter In Reply to General Counsel's Opposition to CNN's Request for Extension of Time To File Exceptions And For An Extension Of The Page Limit In Support of Exceptions, by overnight mail, on the following and notified the same by telephone at the numbers below:

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Gregory Beatty, Esq.
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National Association of Broadcast Employees and Technicians Local 11 145 West 30th Street, 12th Floor New York, NY 10001 (212) 757-3065

Sworn to before me this

5th day of December, 2008

Notary Public
Carole L. Stephens
Notary Public, District of Columbia
My Commission Expires 2-14-2010

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